

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ELNORA CARTHAN, et al.,  
Plaintiffs,

v.

RICK SNYDER, et al.,  
Defendants.

Case No. 5:16-cv-10444-JEL-MKM  
Hon. Judith E. Levy

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**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT OF  
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH  
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA  
OPERATING SERVICES, LLC'S MOTION FOR SUMMARY JUDGMENT**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O'Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 2 is a true and correct copy of a document produced as VWNAOS018930.

3. Attached as Exhibit 3 is a true and correct copy of excerpts of the deposition of Marvin Gnagy.

4. Attached as Exhibit 4 is a true and correct copy of the Supplemental Expert Report of Dr. Larry Russell.

5. Attached as Exhibit 5 is a true and correct copy of the Expert Report of Dr. Larry Russell.

6. Attached as Exhibit 6 is a true and correct copy of a document produced as VWNAOS087372.

7. Attached as Exhibit 7 is a true and correct copy of excerpts of the deposition of Darnell Earley.

8. Attached as Exhibit 8 is a true and correct copy of a document produced as COF\_FED\_0123642.

9. Attached as Exhibit 9 is a true and correct copy of a document produced as COF\_FED\_0009724.

10. Attached as Exhibit 10 is a true and correct copy of a document produced as COF\_FED\_0222608.

11. Attached as Exhibit 11 is a true and correct copy of excerpts of the deposition of Gerald Ambrose.

12. Attached as Exhibit 12 is a true and correct copy of excerpts of the deposition of Daugherty Johnson.

13. Attached as Exhibit 13 is a true and correct copy of excerpts of the deposition of Brent Wright.

14. Attached as Exhibit 14 is a true and correct copy of a document produced as COF\_FED\_1127535.

15. Attached as Exhibit 15 is a true and correct copy of a document produced as COF\_FED\_0009721.

16. Attached as Exhibit 16 is a true and correct copy of a document produced as VWNAOS020165.

17. Attached as Exhibit 17 is a true and correct copy of excerpts of the deposition of Warren Green.

18. Attached as Exhibit 18 is a true and correct copy of the Expert Report of Bill Bellamy.

19. Attached as Exhibit 19 is a true and correct copy of excerpts of the deposition of Dr. Larry Russell.

20. Attached as Exhibit 18 is a true and correct copy of the Expert Report of Dr. Howard Hu.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on May 19, 2023  
Boston, Massachusetts

/s/ James M. Campbell  
James M. Campbell